

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

FORMAN HOLT  
66 Route 17 North, First Floor  
Paramus, New Jersey 07652  
(201) 845-1000  
Attorneys for Charles M. Forman  
Chapter 7 Trustee  
Kim R. Lynch (KL-5866)  
[klynch@formanlaw.com](mailto:klynch@formanlaw.com)

In re:

WRS HOLDINGS, LLC; et al.<sup>1</sup>,  
  
Debtor.

Chapter 7  
Case No. 10-28457 (SLM)

Hearing Date: November 21, 2017  
Hearing Time: 10:00 a.m.

**CERTIFICATION OF SERVICE**

1. I, Kathryn Anema:
  - ☐ represent the \_\_\_\_\_ in the above-captioned matter.
  - ☒ am the secretary/paralegal for Kim R. Lynch, who represents the Trustee in the above captioned matter.
  - ☐ am the \_\_\_\_\_ in the above case and am representing myself.
2. On October 31, 2017 , I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:
  - Notice of Proposed Settlement of Controversy.
  - Notice of Proposed Private Sale.
3. A copy of the Notice of Proposed Settlement of Controversy is attached hereto as Exhibit "A."

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<sup>1</sup> The Debtors in these jointly administered chapter 7 cases are WRS Holdings, LLC, Case No. 10-28457 (DHS); WRS, LLC, Case No. 10-28461 (DHS); Woods Restoration Services, LLC, Case No. 10-28465 (DHS); Woods Restoration Services of South Carolina, LLC, Case No. 10-28471; Woods Restoration Services of Montclair, New Jersey, LLC, Case No. 10-28474 (DHS); Environmental Remediation Concepts, LLC, Case No. 10-28476 (DHS); and WRS, Inc., Case No. 10-28478 (DHS).

4. A copy of the Notice of Proposed Private Sale is attached hereto as Exhibit "B."
5. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: November 1, 2017

/s/ Kathryn Anema  
Kathryn Anema

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Louis T. De Lucia, Esq. Schiff Hardin LLP 666 Fifth Ave, Suite 1700 New York, NY 10103	Attorney for Ambrose Pine, Inc.	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Alexander G. Benisatto, Esq. Shapiro and Croland 411 Hackensack Avenue Hackensack, NJ 07601	Attorney for MFC Capital Funding	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Ari J. Schwartz, Esq. Teitelbaum & Baskin, LLP 3 Barker Ave Third Avenue White Plains, NY 10601	Attorney for J.P. Morgan Chase Bank, N.A.	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Shoshana Schiff, Esq. Trenk, DiPasquale, Webster, Della Fera & Sodono, P.C. 347 Mt. Pleasant Avenue Suite 300 West Orange, NJ 07052	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Sam Della Fera Trenk, DiPasquale, Webster, Della Fera & Sodono, P.C. 347 Mt. Pleasant Avenue Suite 300 West Orange, NJ 07052	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Martha Hildebrandt, Esq. Office of the United States Trustee One Newark Center, Suite 2100 Newark, NJ 07102		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)

Morris S. Bauer, Esq. Norris Mc Laughlin & Marcus, PA P.O. Box 5933 Bridgewater, NJ 08807-5933	Attorney for Creditor Committee - Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
John V. Fiorella, Esq. Archer & Greiner One Centennial Square Haddonfield, NJ 08033	Attorney for Creditor – New Jersey School Boards Association Insurance Group – Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Adam D. Greenberg Honig & Greenberg, LLC 1949 Berlin Road, Suite 200 Cherry Hill, NJ 08003	Attorney for Creditor, Raynor Electric, Inc. – Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
John R. Morton, Jr. Law offices of John R. Morton, Jr. 110 Marter Avenue, Suite 301 Moorsetown, NJ 08057	Attorney for Creditor, Ford Motor Credit Company – Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Ron Reich, Esq. Berry Sahradnik Kotzas & Benson, P.C. 212 Hooper Ave P.O. Box 757 Toms River, NJ 08754 <i>(Attorney for Creditor, Advanced Furnace &amp; Air Duct Cleaning)</i> <i>(Notice of Appearance)</i>	Attorney for Creditor – Advanced Furnace 7 Air Duct Cleaning – Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)

Leonard C. Walczyk, Esq. Wasserman, Jurista & Stolz 225 Millburn Ave., Suite 207 P.O. Box 1029 Millburn, NJ 07041	Attorney for Creditor – Post & Kelly Electric Company – Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Automatic Suppression & Alarm Systems, Inc. 67 Ramapo Valley Road, #101 Mahwah, NJ 07430 Attn: President, Partner or Managing Agent	Creditor - Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Bankruptcy Administration Attn: Christine R. Etheridge IKON Financial Services 1738 Bass Road P.O. Box 13708 Macon, GA 31208-3708	Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Scott E. Reiser, Esq. Lum, Drasco & Positan 103 Eisenhower Parkway Roseland, NJ 07068	Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Stacie Lynn Vacca, Esq. Lum, Drasco & Positan 103 Eisenhower Parkway Roseland, NJ 07068	Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Jay Teitelbaum, Esq. Teitelbaum & Baskin, LLP 3 Barker Ave Third Avenue White Plains, NY 10601	Attorney for JP Morgan Chase Bank, N.A.	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)

James Caporrino, Esq. 130 Fort Lee Road Leonora, NJ 07009	Attorney for Kensaay Associates – Notice of Appearance	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
JP Morgan Chase Bank, NA 201 N. Central Avenue, Floor 11 Phoenix, AZ 85004	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)
Ford Motor Credit Company PO box 537901 Livonia, MI 48153-7901	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by court*)

# **EXHIBIT A**

Document Page 8 of 11  
UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

CASE NO. 10-28457 (Jointly Administered)

Chapter: 7

Judge: Stacey L. Meisel

In Re:

WRS Holdings, LLC et al

Employer's Tax I.D. No.: 20-3657250

**NOTICE OF PROPOSED SETTLEMENT OF CONTROVERSY**

**Charles M. Forman**, Trustee in the above captioned case, proposes to settle an action, the nature of which is described below. If any creditor or other party in interest has an objection to the settlement, an objection and request for a hearing on such objection shall be in writing, served upon the trustee and filed with the Clerk of the United States Bankruptcy Court. Such objection and request shall be filed with the Clerk and served upon the trustee no later than November 14, 2017. **In the event an objection is timely filed, a hearing thereon will be held before the Honorable Stacey L. Meisel on:**

DATE: November 21, 2017

TIME: 10:00 a.m.

COURTROOM: 3A

If no objection is filed with the Clerk and served upon the trustee on or before November 14, 2017, the settlement will be consummated as proposed on or after the fifth day following the last day to file objections.

The nature of the action and the terms of the settlement are as follows:

**Nature of the Action:** Ambrose Pine, Inc. asserts a secured and superpriority claim in the proceeds of the assets liquidated and to be liquidated by the Trustee. Ambrose Pine has requested payment of its claim prior to the approval of the Trustee's final report and account. The Trustee disputes the amount of the Superpriority claim asserted by Ambrose Pine.

**Terms of the Settlement:** Ambrose Pine shall have an allowed superpriority claim in the amount of \$80,000. Within five (5) days of entry of an order approving the settlement, the Trustee will issue a check in the amount of \$80,000 to Ambrose Pine representing payment in full of its superpriority claim. In the event there are any further sums received by me from the liquidation of the Remaining Assets, the proceeds shall be divided equally between Ambrose Pine and the Debtors' estates. Ambrose Pine's interest in the proceeds of the Remaining Assets shall be paid to Ambrose Pine upon the latter of (i) an order approving the sale or settlement of any Remaining Assets, if necessary or (ii) the receipt of funds representing the liquidation of the Remaining Assets without further order of this Court.

Request for additional information about the nature of the action or the terms of the settlement should be directed to:

NAME: Kim R. Lynch, Esq.

ADDRESS: Forman Holt  
66 Route 17 North, First Floor  
Paramus, New Jersey 07652

TELEPHONE NO.: (201) 845-1000

SUBMITTED BY:  /s/ Kim R. Lynch POSITION: Attorney for Trustee PHONE: (201) 845-1000  
Kim R. Lynch



# **EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT**

District of New Jersey  
MLK Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07102

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Case No. 10-28457(SLM)  
Chapter: 7  
Judge: Stacey L. Meisel

In Re: Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

WRS Holdings, LLC <sup>1</sup>  
c/o WRS, LLC  
fka Woods Restoration Holdings, LLC  
22 Riverview Drive  
Suite 101  
Wayne, NJ 07470

Employer's Tax I.D. No.:  
20-3657189

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**NOTICE OF PROPOSED PRIVATE SALE**

Charles M. Forman, Chapter 7 Trustee in the above captioned case, proposes a private sale of certain property of the estate to the persons and on the terms described below.

If any creditor or other party in interest has an objection to the sale, the objection and a request for a hearing on such objection shall be in writing, served upon the person named below, the Trustee and the Clerk of the United States Bankruptcy Court.

Address of the Clerk: United States Bankruptcy Court  
District of New Jersey  
P.O. Box 1352  
Newark, NJ 07101-1352

Such objection and request shall be filed with the Clerk and served upon the person named below on or before November 14, 2017.

In the event an objection is timely filed, a hearing will be held before the Honorable Stacey L. Meisel on:

Date: November 21, 2017  
Time: 10:00 AM  
Location: Courtroom 3A, Martin Luther King, Jr. Federal Building, 50 Walnut Street, 3<sup>rd</sup> Floor, Newark, NJ 07102

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<sup>1</sup> The Debtors in these jointly administered chapter 7 cases are WRS Holdings, LLC, Case No. 10-28457 (DHS); WRS, LLC, Case No. 10-28461 (DHS); Woods Restoration Services, LLC, Case No. 10-28465 (DHS); Woods Restoration Services of South Carolina, LLC, Case No. 10-28471; Woods Restoration Services of Montclair, New Jersey, LLC, Case No. 10-28474 (DHS); Environmental Remediation Concepts, LLC, Case No. 10-28476 (DHS); and WRS, Inc., Case No. 10-28478 (DHS).

If no objection is filed with the Clerk and served upon the person named below or before November 21, 2017, the sale will be consummated on or after the fifth day following the last day to file objections.

THE PROPERTY TO BE SOLD, THE PROPOSED PURCHASER AND THE SALE PRICE:

The Trustee has received an offer from Oak Point Partners, Inc. ("Oak Point") to purchase any remaining assets of the Debtors' bankruptcy estates consisting of known or unknown claims, property rights, or assets which have not been previously sold, assigned, or transferred, but excluding the Default Judgments (as defined below) and the cash held by the Trustee in the Estates' bank accounts pursuant to the terms of the Asset Purchase Agreement (the "Oak Point APA"). The pertinent terms of the Oak Point APA are as follows:

Oak Point shall purchase the Remnant Assets for Ten Thousand (\$10,000.00) Dollars free and clear of all liens, claims, interests and encumbrances pursuant to 11 U.S.C. § 363(b) and (f). The Remnant Assets are being sold "AS IS" AND "WHERE IS" without any representations or warranties of any type or nature. The sale of the Remnant Assets is subject to higher and better offers and approval of the United States Bankruptcy Court. Any initial higher or better offer must be in the amount of \$17,500 and any party desiring to make a higher or better offer must do so on or before November 21, 2017. Potential bidders must purchase the Remnant Assets under the same terms and conditions as set forth in the Oak Point APA.

The Trustee has also received an offer from SM Financial Services Corporation for the Default Judgments obtained by the Trustee during the administration of the Debtors' estates pursuant to the terms of an agreement (the SMFSC Agreement"). The pertinent terms of the SMFSC Agreement are as follows:

SMFSC shall purchase the Default Judgments for One Thousand Five Hundred (\$1,500) Dollars free and clear of all liens, claims, interests and encumbrances pursuant to 11 U.S.C. § 363(b) and (f). The Default Judgments are being sold "AS IS" AND "WHERE IS" without any representations or warranties of any type or nature. The sale of the Default Judgments is subject to higher and better offers and approval of the United States Bankruptcy Court.

Parties may obtain copies of the Motion filed by the Trustee authorizing him to sell the Remnant Assets and Default Judgments and/or the Oak Point APA or SMFSC Agreement by contacting the undersigned counsel at [klynch@formanlaw.com](mailto:klynch@formanlaw.com) and [kanema@formanlaw.com](mailto:kanema@formanlaw.com).

Higher or better offers may be submitted to the selling party no later than the date set for objections set forth above.

Objections must be served on, and requests for additional information should be directed to:

Name: Kim R. Lynch, Attorney for Trustee [klynch@formanlaw.com](mailto:klynch@formanlaw.com)  
Address: Forman Holt, 66 Route 17 North, First Floor, Paramus, NJ 07652  
Telephone: (201) 845-1000